

1 Marc V. Kalagian
2 Attorney at Law: 4460
3 211 East Ocean Boulevard, Suite 420
4 Long Beach, CA 90802
5 Tel: (562)437-7006
6 Fax: (562)432-2935
7 E-Mail: rohlfig.kalagian@rksslaw.com
8 Attorneys for Plaintiff
9 ANDREA JONES

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ANDREA JONES)	Case No.: 2:13-cv-01862-MMD-NJK
)	
13 Plaintiff,)	UNOPPOSED MOTION TO EXTEND
14 v.)	TIME
)	
15 CAROLYN W. COLVIN, Acting)	(FIRST REQUEST)
Commissioner of Social Security.)	
)	
16 Defendant.)	
)	
17 _____)	

18
19 Plaintiff Andrea Jones respectfully requests that the Court extend the time
20 for Plaintiff to file Motion to Remand and/or Reversal due on April 6, 2014 to
21 May 6, 2014. This is Plaintiff's first request for an extension.

22 The original due date fell on a Sunday. The undersigned mistakenly thought
23 that this would push the due date to the next business day which was April 7, 2014.
24 At that time, Plaintiff filed a stipulation for extension of time to file her motion.
25 Docket No. 21. The Court denied the stipulation without prejudice because counsel
26 did not address excusable neglect factors. Docket No. 22. Counsel maintains that

1 his mistake constitutes excusable neglect. The defendant would not be prejudiced
2 by this extension of time.

3 This request is made at the request of Plaintiff's counsel to allow additional
4 time to fully research the issues presented. Counsel for Plaintiff conferred with
5 Defendant's counsel on April 10, 2014, and Defendant's counsel responded on
6 April 10, 2014, that Defendant has no opposition to this motion.

7
8 DATE: April 10, 2014

Respectfully submitted,

9 ROHLFING & KALAGIAN, LLP

10 /s/ *Marc V. Kalagian*

11 BY: _____

Marc V. Kalagian

12 Attorney for plaintiff Ms. Andrea Jones

13
14 DATE: April 10, 2014

DANIEL G. BOGDEN

15 United States Attorney

16 /s/ *Sharon Lahey*

17 BY: _____

Sharon Lahey

18 Special Assistant United States Attorney

Attorneys for defendant Carolyn W. Colvin

19 |*authorized by e-mail|

20
21 IT IS SO ORDERED: _____

22 UNITED STATES MAGISTRATE JUDGE

23 DATED: April 14, 2014